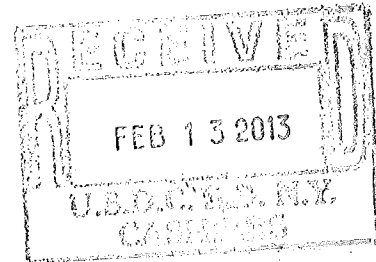


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13 CV 0994

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



OMAR SHIPPING COMPANY S.A.

Plaintiff,

vs.

RIKA GLOBAL IMPEX LIMITED and
SETIT INTERNATIONAL IMPORT-
EXPORT PLC,

Defendants.

13 CV _____ ()

PETITION FOR RECOGNITION,
CONFIRMATION AND ENFORCEMENT
OF FOREIGN ARBITRATION AWARD

Plaintiff Omar Shipping Company S.A. by its attorneys, Blank Rome LLP, as and for its petition for recognition, confirmation and enforcement of a foreign arbitration award pursuant to the United Nations Convention on the Recognition and Enforcement of Foreign Arbitral Awards, June 10, 1958, 21 U.S.T. 2517, 330 U.N.T.S. 38, Chapter 2 of the Federal Arbitration Act, 9 US Code §§201-208 states as follows:

1. This is a case within the Court's Admiralty and Maritime jurisdiction pursuant to 28 USC §1333 and it is a Maritime claim within the meaning of Rule 9(h) of the Federal Rules Civil Procedure.

2. At all times mentioned, herein, Plaintiff, Omar Shipping Company S.A. (hereinafter referred to as "OSC"), was, and now is, a corporation or other business entity duly

organized and existing under and by virtue of the laws of Honduras with an office and principal place of business in Honduras.

3. Upon information and belief, at all times hereinafter mentioned, Defendant Rika Global Impex Limited (hereinafter referred to as "RGI") was and now is a corporation or other business entity duly organized and existing under and by virtue of the laws of a foreign country with its principal place of business located in Mumbai, India.

4. Upon information and belief, at all times hereinafter mentioned, Defendant Setit International Import-Export PLC (hereinafter referred to as "SIIE") was and now is a corporation or other business entity duly organized and existing under and by virtue of the laws of a foreign country with its principal place of business located in a foreign country.

5. As part of their respective trading activities OSC and MST/SIIE entered into a maritime contract commonly referred to as a Bill of Lading which incorporated GENCON Charter Party dated May 13, 2012 (referred to herein as the "Charter Party"). (A copy of a Bill of Lading with the Gencon Charter Party incorporated is attached hereto as Exhibit A.)

6. RGI/SIIE breached the Bill of Lading/Charter Party in several respects, including failing to pay freight and demurrage.

7. Thereafter, in or about July 2012, OSC commenced an arbitration proceeding in London, England to recover the amounts due in owing under the Bill of Lading/Charter Party. (Attached hereto as Exhibit B is a true and correct copy of the particulars of claim that was submitted in the London arbitration.)

8. On November 5, 2012, a final award was issued in favor of OSC as against RGI/SIIE requiring RGI/SIIE to pay OSC a total of \$862,935.00 (hereinafter referred to as the "Final Award"). (Attached hereto as Exhibit C is a true and correct copy of the Final Award.)

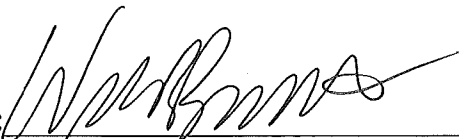
9. Pursuant to the award, RGI/SIIE is obligated to pay OSC the sum of \$862,935.00 together with interest on \$451,060.00 at 5.5% *per annum* and *pro rata* compounded at three monthly rests from June 6, 2012 until the date of payment.

10. OSC having obtained the award against RGI/SIIE now seeks recognition, confirmation and enforcement of the foreign arbitration award and entry of judgment against RGI/SIIE pursuant to Federal Rules of Civil Procedure, Rule 59.

WHEREFORE, Plaintiff prays that pursuant to the United Nations Convention on the Recognition and Enforcement Foreign Arbitration Awards, June 10, 1958, Chapter 2 of the Federal Arbitration Act, and 9 US Code §201-208 that an order be entered recognizing and confirming the foreign award in favor of Omar Shipping Company S.A as against Defendants Rika Global Impex Limited And Setit International Import-Export PLC and that judgment be entered in this Court for the sum of \$862,935.00 together with interest on \$451,060.00 at 5.5% commencing June 6, 2012, and for such other further and different relief as this court may deem just and proper.

Dated: New York, NY
February 12, 2013

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